

EXHIBIT F



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February 28, 2023

Via E-mail

David K. Haller, Esq.
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RE: Hawaii Discount, LLC d/b/a Hawaiiidiscout.com, LLC v. Hawaii Sunset Events, LLC d/b/a Chief's Luau, Teuila Hawaii, LLC
Civil Action No.: 2:21-cv-02011-DCN
Our File No.: 069023/01500

Dear David:

I received your amended notices of deposition dated February 14, 2023, for depositions to occur in Honolulu during the week of April 24, 2023. I have confirmed that Roy Pfund, Eddie Sax, and Joann Erban are available for deposition on the dates noticed, and it is my understanding that Jason Young is available as well. In addition, we can also accommodate the Rule 30(b)(6) depositions of Robert's Hawaii, LLC and Teuila Hawaii, LLC on the dates noticed. Please note, however, that your notice dated February 14, 2023, lists the deposition of Teuila Hawaii, LLC to occur twice, on both April 25 and 26. I assume that you meant to notice the deposition of Robert's Hawaii, LLC (not Teuila Hawaii) to occur on April 25, but please confirm with an amended notice.

Also, I note that your notice of February 14 contained the same Rule 30(b)(6) topics that you included with the prior Rule 30(b)(6) notices. As discussed in my letter of January 13, 2023, we have the following objections to these topics:

- Topic 5 in the Teuila notice (and Topic 7 in the Robert's Hawaii notice) is "Commission paid to Hawaii Discount and the damages suffered by it." First, I don't understand what "it" refers to in this phrase, and the topic generally is unclear. In addition, as you know, we deny that Hawaii Discount suffered any damages whatsoever. We will produce a witness with knowledge of the commissions paid by Teuila to Hawaii, but we object to the remainder of the topic.
- Topic 8 in the Teuila notice is "Chief's Luau's dealings with other ticket sellers." Although we will produce a witness knowledgeable about this topic, we do not agree to have the witness testify regarding the details of Teuila's contractual relationships with other agencies for the same reasons we objected to your prior requests that we produce Teuila's contracts with other agencies.

David K. Haller, Esq.
January 13, 2023
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- Topics 10 and 11 of both notices purport to require the entities to produce a witness with knowledge of all “allegations in the complaint” and all “allegations of the defendants’ answer and counterclaim, and discovery responses.” These topics are overbroad and invasive of attorney-client privilege and work product. We cannot be expected to produce lay witnesses that can speak knowledgeably regarding every allegation in every pleading and discovery response in the case. Thus, we object to these topics.

I had understood from your email dated January 25, 2023, that you were willing to revise these topics to address our concerns. Please let me know if that remains the case. We would certainly prefer to resolve the objections through negotiations but let us know if we should go ahead and move for a protective order. Unless I hear from you by March 8, 2023, we will proceed with a motion.

Very truly yours,



Merritt G. Abney

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cc: Bernard S. Klosowski, Jr., Esq.